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September 21, 2018

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: Notice of Ex Parte Communications
Docket Nos. GN 16-142; MB 17-105; MB 18-202

Dear Madam Secretary,

On September 20, 2018, Patrick McCreery, President, and Joshua Pila, General Counsel, for Meredith Corporation's Local Media Group ("Meredith") met with Commissioner Jessica Rosenworcel and Kate Black of her office. Separately on the same day, Mr. McCreery and Mr. Pila met with Commissioner Michael O'Rielly, Chief of Staff Brooke Ericson, and Kagen Despain of his office. In addition, on the same day, Messrs McCreery and Pila met with Commissioner Brendan Carr and Policy Advisor Evan Swarztrauber.

Messrs McCreery and Pila shared with the above-referenced individuals the attached PowerPoint presentation focused upon the need for flexibility in the review of the Commission's Children's Programming rules (a/k/a KidVid) and in the implementation of the voluntary transition to ATSC 3.0 (Next Generation Television). The meetings also featured an explanation of Meredith's long history and focus on the public interest and serving its viewers.

In particular, Mr. McCreery noted Meredith's participation in the Pearl Phoenix Model Market, and the positive effects therefrom. Mr. Pila encouraged flexibility in filing requirements, especially as the Commission moves from experimental licensing to full licensing via the Licensing Management System and encouraged the use of Special Temporary Authority as needed.

As detailed further in the attached PowerPoint presentation, Messrs Pila and McCreery also shared with the above-referenced individuals Meredith's focus in the ongoing KidVid rules proceeding. Meredith specifically highlighted its support for removing or limiting the "regularly scheduled" KidVid programming requirement, lengthening the daily window for KidVid, flexible multicast options, and paperwork reduction.

In response to inquiries, Meredith noted that electronic programming guides available on station websites or through consumer devices allow for discoverability of children's programming. Furthermore, multicast channels are available over-the-air to all viewers of the main over-the-air channel and OTA use is increasing. In addition, Meredith was asked multiple times about the economic viability of children's programming on multicast channels, to which Meredith noted that there is a balance between public interest obligations and profitability, while noting flexibility in children's advertising limits and different formats could provide the necessary flexibility for greater economic viability.

Should you have any questions about this correspondence, please contact the undersigned counsel.

Very Truly Yours,

Joshua Pila

CC: Patrick McCreery
Michael O'Rielly
Jessica Rosenworcel
Brendan Carr
Brooke Ericson
Evan Swarztrauber
Kate Black
Kagen Despain



Flexibility

September 2018

Patrick McCreery, President – LMG
Joshua Pila, General Counsel – LMG

MEREDITH CORPORATION



Meredith LMG

- Meredith Corporation is a family controlled, publicly traded media company
- Committed to service journalism for more than 115 years
- National Media Group – *Better Homes & Gardens, RealSimple, People, AllRecipes*
- Local Media Group – 17 stations in 12 larger markets (CBS, FOX, ABC, NBC)
 - E.g., Atlanta, Phoenix, Portland, Las Vegas



Focus on Flexibility

- Competing with Non-Regulated Video Players (e.g., Amazon, Netflix, Hulu)
- Providing LOCAL Public Interest Programming – local news, public affairs, debates, community involvement
- Committed to the Public Interest, BUT need flexibility to serve the public



ATSC 3.0

- Part of Pearl Model Market in Phoenix, AZ
- Working closely with Networks and Programmers
- Hot Topics:
 - Paperwork – Programmers, Stations, FCC (e.g., filings)
 - Consumer devices, signal security, and transmission options
 - Testing out features/bugs
- Bottom Line – Industry coalescing and moving forward, but don't add regulatory roadblocks
- FLEXIBILITY NECESSARY



Kidvid

- Meredith LMG has long supported Media Modernization initiatives
- Again, pride in public service, but need flexibility and less paperwork
- Will comment in NPRM, but priorities are:
 - Remove “Regularly Scheduled” requirement
 - Binge/stockpile, reduce burden, kids don’t want a “series” anymore
 - Remove or lengthen window (at least 5 AM – 10 PM)
 - Before school, PBS schedules, preempting news for make goods
 - Multicast flexibility
 - OTA is OTA, in TV listings, apply to “station”
 - Paperwork
 - Annual certification, keep logs
- Bottom line: Committed to all our viewers, no matter age, but need flexibility



Conclusion

- Flexibility, flexibility, flexibility
- Meredith is committed to the Public Interest